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DIOXIN STUDY
Comments on Sampling Plan for Resource Recovery Site
Pasco, Washington

<u>PAGE</u>	<u>PARAGRAPH</u>	<u>LINE</u>	<u>COMMENTS</u>
1-1	2	3	If documentation shows that over 5000 drums of waste from Rhodia were disposed in this facility, it should also be indicated on Table 2 on page A2-1.
2-2	Figure 2.1		Add "R.30E." at top of map.
2-5	2	7	"Open" misspelled.
2-5	2	4	Suggest "No free liquids."
2-6	Figure 2.3		Section 15 mislabeled as "16."
3-1	1	3	(Section 3.2) Mountains misspelled.
3-2	Figure 3.1		A clearer print is necessary.
3-3	1		The sand dune orientation indicates a predominant wind direction from west-southwest in Franklin County (see Hanford EIS for wind roses).
3-3	Table 3.1		"Ringold" is misspelled on this table.
3-5	Figure 3.3		Show the disposal site location on this figure. Change title to something like "Map Showing Location of Geologic Cross Sections."
3-7			Missing.
3-8			Missing.
3-9	3	4	(Section 3.4) Shouldn't the figure reference be 3.6 instead of 3.1?
5-1			(Section 5.1) Referenced site safety considerations not included in review draft.
5-1			(Section 5.2) The construction and sampling of perimeter wells will not accomplish the objective of the investigation, i.e., "to verify the presence of dioxin within the boundaries of the disposal site at concentrations of greater than 1 ppb." If the drums haven't failed, the waste would still be contained in the drums. If they have failed, the waste

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5-1	(Section 5.2 continued)		would be in the unsaturated zone beneath the drums. The absence of dioxin in the perimeter wells and ground water doesn't prove that dioxin is not present in the disposal area.
5-4			(Section 5-3) I agree with the first paragraph, an examination of the waste or the soil beneath (not adjacent to) the waste is necessary to accomplish the objective.
5-5			(Section 5.5) It may be more important to accomplish the objective of the investigation if the drilling positions are <u>not</u> changed should the gradiometer detect probable drums.
5-7	2		What will be the fate and tests performed on the stored cuttings? If hazardous, they will have to be properly disposed.
5-7			(Section 5.7) What tests will be performed on residual cleaning material?
5-9			(Section 5.8) A ground water sample from the down-gradient side of each of the three test areas should be collected and tested for priority pollutants.